

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

Diane Schroeder and Rebecca Schroeder,
individually and on behalf of all other
similarly situated individuals,

Case No. 12-cv-00137 WCG

Plaintiffs,

v.

Humana Inc. and
Humana Insurance Company,

Defendants.

**JOINT MOTION FOR APPROVAL OF FLSA SETTLEMENT AND DISMISSAL OF
CLAIMS**

Plaintiffs Diane Schroeder and Rebecca Schroeder, individually and on behalf of all other similarly situated individuals, by and through their attorneys, and Defendants Humana Inc., and Humana Insurance Company (hereinafter “the Parties”), hereby jointly move this Court for an Order granting this motion requesting that the Court (1) approve as fair, reasonable, and adequate their settlement of this collective action overtime case brought under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 *et seq.*, (2) grant Plaintiffs’ Counsel’s request for attorneys’ fees and reimbursement of out-of-pocket costs and, (3) dismiss the action with prejudice in its entirety.

This joint motion is based upon all of the files, records, and proceedings herein, the joint memorandum of law submitted in support of this motion, all supporting declarations and exhibits, and such other points and authorities as may subsequently be presented to the Court.

WHEREFORE, the Parties jointly respectfully request that this Court GRANT this motion and enter the Proposed Order submitted with the motion.

Date: September 10, 2013

Respectfully Submitted,

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